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August 5, 2025

## **VIA ECF**

Hon. Alvin K. Hellerstein United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl St. New York, NY 10007-1312

Re: United States v. Hwang, Halligan, No. 22-cr-240-AKH

Dear Judge Hellerstein:

We are counsel to defendant Patrick Halligan. We write to respectfully request that Mr. Halligan be permitted to travel to the Binghamton, N.Y. area during the period from August 15 through August 17, 2025. The purpose of the trip is for Mr. Halligan to assist his son as he moves into college for his sophomore year at Binghamton University. Mr. Halligan would travel from his home on August 15, and he would return home on August 17.

Mr. Halligan's conditions of release permit him to travel in the Southern District of New York and the Eastern District of New York. [See ECF No. 9.] This request seeks permission for him to travel in the Northern District of New York during the period from August 15 through August 17, 2025; additionally, he is requesting permission to travel in and through the District of New Jersey and the Middle District of Pennsylvania while en route to and from Binghamton.

We have conferred with Pretrial Services and the U.S. Attorney's Office regarding this request, and both have advised that they do not object.

We respectfully request that the Court endorse this letter to permit Mr. Halligan to travel as proposed.

Respectfully submitted,

May Nulling

Mary E. Mulligan